# UNITED STATES OF AMERICA BEFORE THE NATIONAL LABOR RELATIONS BOARD SUBREGION 24

INTERNATIONAL SHIPPING AGENCY, INC., MARINE TERMINAL SERVICES, INC., and TRUCK TECH SERVICES, INC., a SINGLE EMPLOYER

24-CA-091723 24-CA-104185 12-CA-129846

and

UNIÓN DE EMPLEADOS DE MUELLES (UDEM)

# INFORMATIVE MOTION AS TO POSITION OF AFFECTED WORKERS WITH RESPECT TO ANY REQUEST FOR POSTPONMENT

To the Honorable Administrative Law Judge Robert A. Ringler:

COMES NOW, UNION DE EMPLEADOS DE MUELLES DE PUERTO RICO, INC. (hereinafter referred to as "**UDEM**"), by and through the undersigned attorneys, and respectfully states, alleges and prays as follows:

- 1. In the instant cases the Honorable Administrative Law Judge issued a decision on June 16<sup>th</sup>, 2015 consolidating the cases and ordering to be simultaneously heard beginning on July 13<sup>th</sup>, 2015. Therefore, all the allegations and arguments made by the I.L.A. and Intership, aimed to stay the proceedings in disregard for the rights of the terminated workers that for almost three (3) years have been waiting for a decision on their claims, have been rejected.
- 2. In light of the above stated, and after informing all the claimants about the hearings that will begin on July 13<sup>th</sup>, we are hereby conveying what they have informed us:

their position is that they will oppose to any request to postpone or in any way suspend the hearings; that after almost three (3) years and a long process, they request a final solution to their situation.

**WHEREFORE**, it is most respectfully requested from this Board to take notice of what has been informed, in order to deter questionable strategies where the rights of the workers would be further harmed without any justification.

#### RESPECTFULLY SUBMITTED

In San Juan, Puerto Rico, this 22<sup>nd</sup> day of June, 2015.

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### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 22<sup>nd</sup> day of June, 2015, I have electronically served the instant motion by electronic filing with the NLRB Division of Judges and by electronic mail to: Lilyvette Rodriguez Soto, Esq., Counsel for the General Counsel, National Labor Relations Board, Subregion 24, Isis M. Ramos Meléndez, Esq., Counsel for the General Counsel, National Labor Relations Board, Subregion 24; Antonio Cuevas Delgado, Esq. and Henry P. Gonzalez, Esq., Counsel for the Respondent; Elizabeth Alexander, Esq., Leslie Mardon, Esq. and Vanessa Marzán Hernández, Esq., Counsel for International Longshoremen's Association; José Añeses, Esq. and Michelle Acosta, Esq., Counsel for Union Independiente de Empleados de Muelles de Puerto Rico y el Caribe, Inc., as follows:

## By electronic filing:

Hon. Robert A. Ringler National Labor Relations Board Division of Judges 401 Peachtree Street, N.W., Suite 1708 Atlanta, GA 30308-3510

# By electronic mail:

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